

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

ARTHUR WAGNER, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BENEFITS PARTNER, LLC d/b/a SALUS
GROUP,

Defendant.

Case No. 2:25-CV-11219-LVP-APP

Hon. Linda V. Parker

Hon. Mag. Anthony P. Patti

**STIPULATION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF’S CLASS ACTION
COMPLAINT**

Plaintiff Arthur Wagner (“Plaintiff”) and Defendant Benefits Partner, LLC d/b/a Salus Group (“Salus Group” and, together with Plaintiff, the “Parties”) hereby file this stipulation seeking an order from the Court extending Salus Group’s deadline to respond to Plaintiff’s class action complaint by forty-five (45) days to July 7, 2025 (“Stipulation”). Good cause exists to grant this Stipulation based on the following facts:

1. On April 28, 2025, Plaintiff filed in the United States District Court for the Eastern District of Michigan a class action complaint against Salus Group arising from an alleged security incident involving one employee’s email account (“Complaint”). [Dkt. No. 1.]

2. Based on the proof of service stating service was effected on April 30, 2025 [Dkt. No. 3], Salus Group's responsive pleading deadline is currently May 21, 2025.

3. Two other class action complaints arising from the same alleged security incident have been filed in this district court. *Tilger v. Benefits Partner, LLC d/b/a Salus Group*, No. 2:25-cv-11108-LVP-APP (E.D. Mich.); *Orosco v. Benefits Partner, LLC d/b/a Salus Group*, No. 2:25-cv-11204-LVP-APP (E.D. Mich.). Plaintiff in the first-filed *Tilger* filed a motion to consolidate these actions and appoint interim lead counsel on May 6, 2025 ("Motion to Consolidate"). [*Tilger* Dkt. No. 6.] The parties herein support the motion to consolidate.

4. In addition to the Motion to Consolidate, Salus Group recently retained counsel and is still analyzing Plaintiff's claims and the underlying facts.

5. Accordingly, the extension requested herein is brought in good faith, in the interests of justice and judicial economy, and not for purposes of delay. This is the first extension sought by Salus Group.

6. Therefore, the Parties respectfully request that the Court grant this Stipulation and continue Salus Group's responsive pleading deadline by forty-five (45) days to July 7, 2025.

IT IS SO STIPULATED.

Dated: May 19, 2025

By: /s/ Katherine L. Pullen

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Dated: May 19, 2025

By: /s/ Sean Short (w/ permission from
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Hon. Mag. Judge Anthony P. Patti

**ORDER GRANTING STIPULATION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S CLASS
ACTION COMPLAINT**

The Court, having read and considered Plaintiff Arthur Wagner (“Plaintiff”) and Defendant Benefits Partner, LLC d/b/a Salus Group’s (“Salus Group”) stipulation seeking an order from the Court extending Salus Group’s deadline to respond to Plaintiff’s class action complaint by forty-five (45) days to July 7, 2025 (“Stipulation”), and finding good cause therefor, **HEREBY ORDERS** that Salus Group’s responsive pleading deadline is continued by forty-five (45) days to July 7, 2025.

IT IS SO ORDERED.

s/ Linda V. Parker
LINDA V. PARKER
U.S. DISTRICT JUDGE

Dated: May 19, 2025